



California Regional Water Quality Control Board

Central Valley Region

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COMMENTS, USE PERMIT 07-001, WINEMUCCA TRADING, CO, LTD, SHASTA COUNTY

California Regional Water Quality Control Board, Central Valley Region (Regional Water Board) staff has reviewed the subject Project proposal to store industrial grade vegetable oil at the former Simpson (Shasta) Pulp and Paper Mill and offer the following comments.

1. According to the Project proposal, the total aboveground tank capacity for vegetable oil storage is 438,200 gallons. On Assessors Parcel Number (APN) 090-150-008, six tanks totaling 144,000 gallons are proposed. On APN 090-150-009 and 090-150-011, eleven tanks totaling 294,200 are proposed. The Project proposal is "to store about five trucks per month"; however, truck capacity and the loading order of the tanks is not provided.
2. The proposed aboveground tank capacity for vegetable oil storage exceeds 1,320 gallons; therefore, the Project is regulated by the U.S. Environmental Protection Agency (U.S. EPA) in accordance with 40 CFR, Subpart C, Section 112.12. Shasta County should contact U.S. EPA Region 9 staff for additional comments.
3. On 29 October 2004, the Regional Water Board issued Winemucca Trading Company Limited, Inc. (Winemucca), Cleanup and Abatement Order No. R5-2004-0717 (CAO) requiring cleanup of waste and abatement action with respect to the Former Shasta Pulp and Paper Mill, wastewater treatment lagoons, and related properties. The parcels outlined in red on two Project attachments (APN 090-150-008, 090-150-009, 090-150-010, 090-150-011, 090-150-012, 090-170-005 and 090-170-006) are subject to the CAO.
4. APN 090-170-006, outline in red on one Project attachment, is currently owned by PG&E, operated by Wheelabrator Lassen, Inc., and regulated by Regional Water Board Waste Discharge Requirements Order No. R5-2003-0013 (NPDES No. CA0081957). A copy of the NPDES Permit and the CAO are available for review at http://www.waterboards.ca.gov/centralvalley/adopted_orders/.
5. The CAO requires Winemucca to, in part, remove and properly dispose of paper processing materials stored in tanks at the Former Shasta Pulp and Paper Mill. To date, Winemucca has not provided Regional Water Board staff evidence describing the removal and disposal activities. Therefore, some or all of the proposed Project tanks



described above, may still contain former paper processing materials. In addition to complying with the CAO, Winemucca should provide appropriate certification that the Project aboveground storage tanks meet the Federal criteria for vegetable oil storage. The reuse of the Former Shasta Paper Company aboveground tanks for industrial grade vegetable oil storage, before certification, may result in contamination with the paper processing materials contained in the tank, and creation of a waste requiring proper disposal. For additional information, see <http://www.epa.gov/emergencies/content/spcc/index.htm>.

6. On 28 January 2005, to comply with the CAO, Winemucca submitted a Storm Water Pollution Prevention Plan (SWPPP) for the Former Shasta Pulp and Paper Mill. According to the SWPPP, the storm drainage inlets and surface water flows from Former Shasta Pulp and Paper Mill discharges to the wastewater treatment lagoons (APN 090-090-009, 090-090-010, and 090-100-004).
7. On 10 October 2006, Winemucca submitted the Feasibility Study, Wastewater Treatment Facility, proposing to divert storm water runoff from the Former Shasta Pulp and Paper Mill prior to removing sludge from the treatment lagoons a CAO requirement. Regional Water Board staff has no evidence that the storm water diversion, scheduled for completion by 31 March 2007, has occurred.
8. The Project sketches for APN 090-150-008, 090-150-009 and 090-150-011 shows several storm drains, some inside the aboveground tank containment walls. The containment walls must be redesigned, in accordance with regulatory requirements, to control potential vegetable oil releases and prevent threatened discharges to surface waters through the storm drains. The wastewater treatment lagoons are not designed to control or treat vegetable oil.
9. Tank truck discharges of vegetable oil may occur during truck unloading, truck-to-tank and tank-to-truck transfers, and truck loading operations. Drainage systems adjacent to the Project loading, unloading, and piping areas must be redesigned in accordance with regulatory requirements to prevent threatened discharges to surface waters.

Thank you for the opportunity to comment on Use Permit No. 07-001. If you have any questions, please contact me at (530) 224-4852, or at the letterhead address.



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